

AO 91 (REV.5/85) Criminal Complaint

AUSA Mark Jones & AUSA Kartik K. Raman (312) 469-6026

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

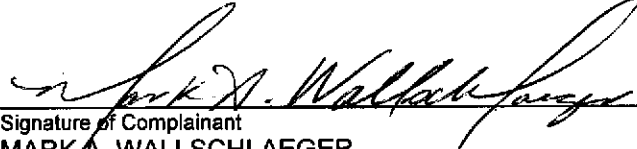
DEOQUISTO D. DENNIS

FILED
J.N. 12-31-09
DEC 31 2009
CRIMINAL COMPLAINT
MAGISTRATE JUDGE SCHENKIER
CASE NUMBER:
09CR 1061
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: On or about December 22, 2009, at Burbank, in the Northern District of Illinois, Eastern Division DEOQUISTO D. DENNIS, defendant herein:

by intimidation, took from the person and presence of bank employees, money belonging to and in the care, custody, control, management, and possession of the TCF Bank, 7910 S. Cicero Avenue, Burbank, Illinois, the deposits of which were insured by the Federal Deposit Insurance Corporation;

in violation of Title 18, United States Sections 2113(a). I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.


Signature of Complainant
MARK A. WALLSCHLAEGER
Special Agent, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

December 31, 2009
Date

at Chicago, Illinois
City and State

SIDNEY I. SCHENKIER, U.S. Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

I, Mark A. Wallschlaeger, being duly sworn depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed for approximately 13 years. I am assigned to the Violent Crimes Squad ("VCS") of the FBI's Chicago Field Office and have been on the VCS for approximately six years. My duties on the VCS include the investigation of various crimes, including bank robberies in violation of Title 18, United States Code, Section 2113(a).

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The December 22, 2009 Robbery of TCF Bank

3. On December 22, 2009, at approximately 2:00 p.m., TCF Bank was robbed by an individual described by the bank employees and depicted on bank surveillance cameras as a black male, approximately 5'8" to 5'9", 150-160 pounds, 25-30 years old, wearing a blue hooded sweatshirt with a SOUTHWEST Airlines logo with wings embroidered on the garment, an orange traffic vest, and glasses with thick black frames.

4. At approximately 2:00 p.m. on December 22, 2009, the above-described black male ("the Robber") entered the Jewel grocery store where the TCF Bank branch is located. According to a bank teller ("Teller A"), the Robber approached Teller A and said he wanted to make a withdrawal, but forgot his identification. The Robber then went outside, but returned to Teller A. The Robber presented a robbery note written on a pink TCF withdrawal slip. The note read "GIVE ME EVERYTHING OUT REGISTER NOW DON'T TEMP ME." Teller A read the robbery note and began taking money from her teller drawer to give to the Robber. When Teller A tried to give the money to the Robber, the Robber stated, "Envelope." Teller A then placed the money in an envelope and handed it to the Robber. The Robber then left the area where the TCF bank is located and exited the grocery store. The robbery note was left with Teller A.

5. Following the robbery, the bank notified the Burbank Police Department ("BPD") and the FBI of the bank robbery. Investigators from BPD and FBI responded to the TCF Bank to conduct interviews of the victims/witnesses, collect evidence, review the surveillance video, and canvass the area for potential witnesses.

6. TCF Bank possesses a video surveillance system. Images of the Robber were captured by that system. In addition, photographs from the video were printed and provided to

investigators. I have reviewed the photographs from the TCF video surveillance system. The photographs reveal that the Robber was a black male, approximately 5'8" to 5'9", wearing a dark jacket with reflective strips on the sleeves, a gray hooded sweatshirt, blue shirt, and an orange reflective vest.

7. The City of Burbank possesses a video surveillance system located in the parking lot of the Jewel grocery store. Images of the Robber were captured by that system prior to the robbery. Additionally, photographs from the video were printed and provided to the FBI agent who responded to the bank robbery. I have reviewed the photographs from the video surveillance system. An individual dressed in the clothing described in the previous paragraph was observed getting into a red sedan in the Jewel parking lot. The front of the vehicle is visible on the video. The vehicle appears to be similar to a Saturn Ion.

The Identification of DEOQUISTO D. DENNIS as the Bank Robber

8. Because the Robber was wearing what appeared to be a Southwest Airlines uniform during the robbery of the TCF Bank on December 22, 2009, Southwest Airlines personnel were contacted and shown photographs of the Robber captured from the bank video surveillance system which was in use at the TCF Bank, 7910 S. Cicero Ave., Burbank, Illinois on December 22, 2009. Southwest Airlines personnel were also shown photographs captured from the respective bank video surveillance systems which were in use during several previous robberies or attempted robberies in which the Robber is also believed to have been involved. The other robberies/attempted robberies include: the November 20, 2009 robbery of Chase Bank, 5687 S. Archer Ave., Chicago, Illinois; the December 16, 2009 attempted robbery of Chase Bank, 4730 W. 79th Street, Chicago, Illinois; and the December 17, 2009 robbery of TCF Bank, 8801 S. Ridgeland Ave., Oak Lawn, Illinois. Several

of the Southwest employees identified DEOQUISTO D. DENNIS, who is a former Southwest Airlines employee, as the individual who is depicted in the photographs taken from the bank surveillance video which recorded events at the TCF Bank, 7910 S. Cicero Ave., Burbank, Illinois during the December 22, 2009 robbery. According to Southwest employees, DENNIS was employed as a ramp agent and would have worn a blue jumpsuit with a reflective vest while working at Southwest. They described DENNIS as being approximately 5'8" to 5'9" tall and in his mid 20s. They further stated that Southwest Airlines does not require the return of uniforms when employees leave Southwest employment.

9. A check of Illinois Secretary of State vehicle records reflects that a 2006 Saturn four-door, VIN 1G8AJ55F06Z161247, Illinois registration 9160594, is registered to DENNIS and DEBORAH CROWDER, 8553 S. Kilbourn, Chicago, Illinois. The Illinois Secretary of State driver's license records identify DENNIS as a black male, approximately 5'9", 147 pounds, 24 years of age, who resides at 8553 S. Kilbourn Ave., Chicago, Illinois.

10. A check of a commercial data base reflects that the vehicle registered to DENNIS is a 2006 Saturn Ion four-door sedan. I have viewed photographs of Saturn Ion four-door vehicles and they appear similar to the vehicle captured in images taken by the Burbank city cameras at the time of the December 22, 2009 robbery.

11. On December 30, 2009, Individual A contacted the FBI and reported that he/she recognized DENNIS as the individual depicted on Bandittracker.com, a website maintained by the FBI which depicts surveillance photographs of recent bank robberies which are under investigation. The website is utilized to solicit tips from the general public in an effort to solve pending investigations. I find the information provided by Individual A to be reliable and credible

because it is consistent with other evidence obtained during this investigation. Individual A did not review a photograph of the individual whose image was captured by the bank surveillance video which recorded the events at the TCF Bank, 7910 S. Cicero Ave., Burbank, Illinois during the December 22, 2009 robbery because that photograph was not yet posted on Bandittracker.com. However, Individual A stated that he/she was certain that DENNIS was pictured in bank surveillance photographs associated with the December 16, 2009 attempted robbery of Chase Bank, 4730 W. 79th Street, Chicago, Illinois; and the December 17, 2009 bank robbery of TCF Bank, 8801 S. Ridgeland, Chicago, Illinois. Individual A stated that during the past several weeks, he/she has also observed DENNIS wearing clothing similar to that worn by the robber during the December 16, 2009 attempted robbery and the December 17, 2009 bank robbery. Individual A also stated that he/she saw DENNIS driving a red Saturn Ion on or about December 24, 2009. Additionally, the vehicle captured by the Jewel video surveillance system during the time of the December 22, 2009 bank robbery of TCF Bank, 7910 S. Cicero, Burbank, Illinois is consistent in appearance with a red Saturn Ion.

12. A subsequent bank audit determined that the TCF Bank located at 7910 S. Cicero Ave., Burbank, Illinois sustained a loss of approximately \$742 during the December 22, 2009 robbery.

13. At the time of the December 22, 2009 robbery, the deposits of the TCF Bank were insured by the Federal Deposit Insurance Corporation.

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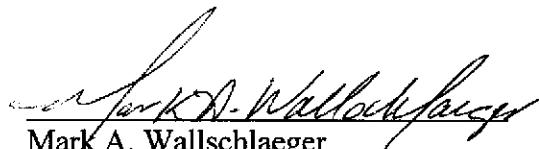
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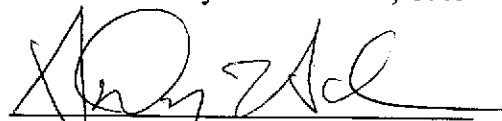
Conclusion

14. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that DEOQUISTO D. DENNIS did by intimidation, take approximately \$742.00 in United States Currency belonging to, and in the care, custody, control, management, and possession of the TCF Bank branch office located at 7910 S. Cicero, Burbank, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.


Mark A. Wallschlaeger
Special Agent
Federal Bureau of Investigation

Subscribed to and sworn before
me this 31st day of December, 2009


SIDNEY I. SCHENKIER
United States Magistrate Judge